

Schary, Claire

From: Schary, Claire
Sent: Friday, December 13, 2013 7:05 PM
To: Carrie Sanneman; Bobby Cochran
Cc: Bott, Dustan; Keenan, Dru; Park, Chae; Poulsom, Susan; Psyk, Christine; Rose, Bob; Stewart, William C.
Subject: My comments on the Combined Best Practices Draft Document
Attachments: JRA Draft Best Practices_2013 11 12 - Schary comments.docx

Carrie & Bobby,

Since I'm starting a three week vacation as soon as I send off this email, I am giving you my comments well before your deadline. I tried to be thorough – and perhaps that was accomplished with 128 comments in Track Changes. I am still not sure I caught everything because it's such a densely written document and I had to squeeze in my review between other pressing work so I didn't have time to go back through what I said and make sure I got it right. However, I know that we will have another chance after you work through the comments you receive on this round and send out another draft for our review. (And once again, I hope my comments will inspire others on my team to submit comments themselves - and you did get some from Susan and Bob, I know, and Chae and Dustan may be sending you some soon.)

Even though they may be mostly reflected in my comments in Track Changes, I want to provide some general comments that you should consider for the entire document. Here they are, in no particular order:

- I suggest not calling these Draft "Best Practices" but Draft "Recommendations" or Draft "Recommended Practices" to avoid confusion with BMPs and because recommendations are closer to what they really are.

- Each of the Draft Recommendations (as I am calling them) needs to be considered how it will read to someone who doesn't get to the commentary or sees it entirely out of the context of this document. The reality is these will be extracted and put in other places for other purposes. Therefore, I urge you to keep the wording consistent in the tone of recommending something and not directing or dictating that it be done. Replacing all instances of the word "must" with "should" is an important place to start. I did some directing editing on that towards the end, but initially I only suggested that to you in my comments. Also, make sure the first sentence in the recommendation box contains some words that directly put it on the context of trading. That way it won't come across as a recommendation for something that is outside the scope of this document. And my other favorite, as you will see in my comments, is to try and have that first or second sentence include an answer to the question "why is this being recommended?" Without that answer, it's not clear what makes that recommendation so important, and that will help when it's extracted and quoted somewhere else.

- I am consistently confused throughout the document by whether "trading program" is referring to the state's trading program or one that is being developed for a particular watershed (that may also be consistent with the state's trading guidance or regulations on trading that is the state trading program). That needs to be made more clear in each instance.

- To help make the document shorter, avoid repeating EPA's Trading Policy in such length – just refer to it and let them find the part you think is important. What this document should do is highlight what is being recommended that is not addressed in the policy or needs more explanation. This document needs to be something unique from EPA's policy and guidances and offer more useful information for establishing a trading program.

- This document will still be longer than most people want to read and dense, so I really urge you think about ways to make it more user friendly. My suggestion is to develop a diagram of the entire trading process and then you can refer back to that to show where each topic fits into that process. For example, trading ratios – do they get applied at the

project creation stage or after the baseline requirement is factored in and when the credit amount is finally ready to be calculated – and how does that fit in with the validation stage?

OK, that's enough for now and time to start my vacation! I think I know what you will be doing when I'm off having fun.... I'll be back Jan. 6th

Happy Holidays!

-- Claire

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